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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA

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IN RE:

Case No. 18-51144-btb

(Chapter 11)

COPPER CANYON PARTNERS LLC,

Debtor.

**EX-PARTE MOTION FOR ORDER
SHORTENING TIME**

Hearing Date: N/A

Hearing Time:

Est. Time:

Set by:

SUMMARY IMPACT OF REQUEST TO SHORTEN TIME

The subject Motions on which an Order Shortening Time is requested herein will have an estimated 10-20 minute impact on the Court's calendar.

COPPER CANYON PARTNERS LLC, a Nevada limited liability company("Debtor"), by and through its attorneys STEPHEN R. HARRIS, ESQ. of HARRIS LAW PRACTICE LLC, hereby moves and represents as follows:

1. Debtor filed a Voluntary Petition for Chapter 11 relief on October 11, 2018. No trustee has been appointed and Debtor acts as Debtor-in-Possession herein.

2. On February 21, 2019, Debtor filed its MOTION REQUESTING ORDER

1 APPROVING SALE OF ASSETS FREE AND CLEAR OF LIENS, CLAIMS AND
2 ENCUMBRANCES (11 U.S.C. § 363(b) and (f)) (Docket No. 93) ("Motion").

3 3. The Motion seeks an Order order authorizing Debtor to sell approximately 1,300
4 unimproved acres of real property located in the eastern portion of the City of Sparks, Washoe
5 County, State of Nevada, as set forth in the Motion, and that any such order include a waiver of
6 the 14 day stay under Rule 6004(h).

7 4. Time is of the essence in hearing the Motion because Debtor needs to consummate
8 this sale after Court approval, which sale will allow the Debtor to have sufficient money on hand
9 to pay all outstanding allowed secured and unsecured creditors' claims, as well as payment of all
10 allowed administrative claims, with significant monies to be available to the Debtor's equity
11 interest holders

12 5. Debtor will provide notice of the Motion via email or facsimile to the Debtor's
13 secured creditors, the attorneys for creditors affected by the Motion, the Office of the United
14 States Trustee, and the creditors holding the twenty largest unsecured claims, including attorneys
15 for the Debtor's disputed creditors. All other creditors shall receive notice of the Motion via
16 regular U.S. Mail unless the Debtor can obtain email addresses or facsimile numbers for such
17 creditors.

18 WHEREFORE, Debtor respectfully requests that this Court enter an order shortening the
19 time for notice of hearing with respect to its MOTION REQUESTING ORDER APPROVING
20 SALE OF ASSETS FREE AND CLEAR OF LIENS, CLAIMS AND ENCUMBRANCES (11
21 U.S.C. § 363(b) and (f)) (Docket No. 93), so that such hearing may be held by this Court on or
22 March 6, 2019, at 2:00 p.m., or as soon thereafter as may be convenient to this Court's calendar;
23 and for such other and further relief as the Court deems just under the circumstances.

24 DATED this 21st day of February, 2019.

25 STEPHEN R. HARRIS, ESQ.
26 HARRIS LAW PRACTICE LLC

27 /s/ Stephen R. Harris

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Attorneys for Debtor